

1 UNITED STATES DISTRICT COURT
2 CENTRAL DISTRICT OF CALIFORNIA
3 EASTERN DIVISION

4 RAUL NOVOA, *et al.*, individually and
5 on behalf of all others similarly situated,

Civil Action No. 5:17-cv-02514

6 *Plaintiffs,*

7 v.

8 THE GEO GROUP, INC.,

9 *Defendant.*

10 **DECLARATION OF RAUL NOVOA**

11 I, RAUL NOVOA, declare as follows:

12 1. I am over the age of eighteen, competent to testify in this matter, and do
13 so based on personal knowledge.

14 2. I am a citizen of Mexico and have been a lawful permanent resident of the
15 United States since I was four years old.

16 3. I am a resident of Los Angeles, California, and I have longstanding family
17 and community ties to the Los Angeles area.

18 4. I entered the Adelanto ICE Processing Center (the "Adelanto Facility") as
19 a civil immigration detainee in June 2012. United States Immigration and Customs
20 Enforcement ("ICE") released me from the Adelanto Facility in February 2015.

21 5. Upon my entry to the Adelanto Facility, Defendant The GEO Group, Inc.
22 ("GEO") issued me a "Detainee Handbook."

1 6. I learned about the Work Program upon my entry to the Adelanto Facility
2 and requested to take part in the program

3 7. I worked as a janitor in the Work Program. As a janitor, I worked in a five-
4 person crew to clean windows, floors, showers, bathrooms, and communal areas in the
5 Adelanto Facility. I worked four-hour shifts, up to seven days per week.

6 8. I also worked as a barber in the Work Program. As a barber, I provided
7 haircutting services to other detainees, and I worked up to 10 hours per day, seven days
8 per week.

9 9. GEO supervised and controlled all aspects of my work, providing me with
10 the training and equipment I needed to perform my jobs at the Adelanto Facility.

11 10. Because of my detainee status, GEO did not permit me to seek
12 employment from another employer outside the walls of the Adelanto Facility.

13 11. Regardless of how many hours I worked in a day or week, GEO paid me
14 only \$1 per day. I did not earn minimum wage for the work I performed at the Adelanto
15 Facility for GEO.

16 12. From my review of the Detainee Handbook, I understood that detained
17 immigrants who disobey GEO officials or refuse to clean can be subject to disciplinary
18 action, including solitary confinement.

19 13. On several occasions, GEO officials threatened to put me in disciplinary
20 segregation, or solitary confinement, if I stopped working, encouraged other detainees
21 to stop working or complained about subminimum wages.

1 14. On several occasions, officers threatened to or actually forced me to move
2 to a different living unit, away from my peers and friends, after complained about the
3 Work Program, subminimum wages and/or the deprivation of necessities at Adelanto.
4 During these transfers, GEO officers would “toss” my cell by throwing my belongings
5 and papers in disarray. As a result of these actions, I felt harassed, intimidated,
6 threatened, and embarrassed.

7 15. I participated in the Work Program in order to buy daily necessities that
8 GEO failed to provide for me, such as food, bottled water, shampoo, lotion, soap,
9 sunscreen, and even shoes. I relied on my wages to buy those items from commissary. I
10 knew that if I stopped participating in the Work Program, I would not have access to
11 these items.

12 16. If given a meaningful choice, I would not have worked for GEO for \$1
13 per day.

14 17. To the best of my knowledge, hundreds of detainees, if not more, took
15 part in the Work Program while I was the Adelanto Facility. I believe that other detainees
16 performed similar work assignments, as well as jobs in food service, laundry, the library,
17 the barbershop, and other cleaning and maintenance type jobs. I am not aware of any
18 detainee receiving more than \$1 per day for participating in the Work Program.

19 18. I understand that I am bringing this case on behalf of all current and former
20 immigrants detained at the Adelanto Facility since GEO assumed responsibility for the
21 facility in May 2011, not just myself.

1 19. I understand the responsibilities involved in being both a plaintiff and a
2 class representative in this lawsuit. I am prepared to cooperate with my counsel and meet
3 all of my duties and obligations to make sure this lawsuit is pursued in the best interest
4 of myself and all other class members. I understand that means that I may be required
5 to have my deposition taken by GEO's lawyers and respond to other discovery.

6 20. I am prepared to help prepare for and attend trial, to testify, and assist my
7 attorneys as needed and to continue to participate actively in the direction of this case.

8 I declare under penalty of perjury under the laws of the United States that the
9 foregoing is true and correct and based on my personal knowledge.

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11 Executed in Los Angeles, California, on September 11, 2019.

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15 Raul Novoa, Plaintiff
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